

## WEBSITE PRIVACY POLICY: OPTIONIS

### SUMMARY OF OUR PRIVACY POLICY

Your privacy is extremely important to us and we are committed to protecting your personal data. This privacy notice will inform you how we look after your personal data when you visit our website and tell you about your privacy rights and how the law protects you.

### PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how the Optionis Group collects and processes your personal data through your use of this website, including any data you may provide through this website when you request a call back to discuss the services that we may offer you or by filling out forms on our site at [www.optionis.co.uk](http://www.optionis.co.uk) or corresponding with us by phone, email or otherwise.

We do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide of specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### CONTROLLER

Optionis Group is made up of, *inter alia*, the following different legal entities:

- ClearSky Contractor Accounting Limited
- ClearSky Payroll and Accountancy Limited
- SJD Accountancy Limited
- Brian Alfred Associates Limited
- Parasol Limited
- Arnsco Limited
- First Freelance Limited
- First Umbrella Limited
- Nixon Williams Limited

This privacy notice is issued on behalf of the Optionis Group so when we mention Optionis, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company within the Optionis Group responsible for processing your data. Optionis Group Limited is the controller and responsible for this website.

We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this privacy policy.

Our full details are:

0800 458 0818  
[info@optionis.co.uk](mailto:info@optionis.co.uk)

[Optionis.co.uk](http://Optionis.co.uk)

Optionis HQ, 1110 Centre Park Square, Warrington, WA1 1RU

Optionis Group Limited  
DPO: Phoebe Campbell  
Email: [data@optionis.co.uk](mailto:data@optionis.co.uk)  
Address: Data Protection Officer, Optionis House, 840 Ibis Court, Centre Park, Warrington,  
Cheshire, WA1 1RL

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **THIRD PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, you should read the privacy notice of every website you visit.

### **THE INFORMATION WE COLLECT**

Personal data means any information about an individual from which that person can be identified. We may collect and process the following data about you:

- Technical data: includes IP address, browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access this website.
- Usage data: include details of your visits to our website, web server statistics, traffic data, location data and details of the web pages and resources that you access. Marketing and communications data: includes your preferences in receiving marketing from us and our third parties and your communication preference.
- Identity data: includes first name, last name, username
- Contact data: includes email address and telephone numbers.

We collect, use and share Aggregated Data for any purpose. This is statistical data about our users' browsing actions and patterns and does not directly or indirectly identify any individual and as such is not considered personal data in law.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **How do we collect your personal data?**

We use different methods to collect data from and about you including:

0800 458 0818  
[info@optionis.co.uk](mailto:info@optionis.co.uk)

[Optionis.co.uk](http://Optionis.co.uk)

Optionis HQ, 1110 Centre Park Square, Warrington, WA1 1RU

**Direct interaction:** you may provide us with your identity and contact data by filling in forms through this website or by corresponding with us via post, email or telephone. This will include personal data you provide when you:

- Request more information about our services
- Request marketing to be sent to you
- Give us feedback
- Sign up for our services

**Automated technologies or interactions:** when you use our website, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to user needs.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

### How we use your personal data

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where you have consented for us to do so.

We have set out below a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so. We may process your data on more than one lawful ground depending on the purpose for which we are using your data.

Purpose	Type of data	Lawful basis for processing
To contact you after you have requested that we do so	(a)Identity (b)contact	Consent.
To provide you with further information about our services or marketing	(a)Identity (b)contact	Consent  0800 458 0818 info@optionis.co.uk

materials.		
To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

## MARKETING

We may use your personal information to tell you about relevant products and services that we think may be of interest to you. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We can only use your personal information to send you marketing messages if we have either your consent (which we will ask for via an opt-in or soft opt-in) or a legitimate interest. A legitimate interest is when we have a business or commercial reason to use your information taking into consideration your interests. A soft opt-in is a specific type of consent that applies when we have previously provided services to you and we are marketing other related services.

We will get your express opt-in consent before we share your personal data with any company outside the Optionis group of companies for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to communications between us necessary to carry out any services required by you or any other important notice in relation to our service offering and changes to your existing services.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **WHO WE SHARE YOUR PERSONAL DATA WITH**

We may have to share your personal data with the third parties set out below for the purposes set out in the table above.

- Companies within the Optionis Group
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **INTERNATIONAL TRANSFERS**

We will only send your data outside of the European Economic Area (“**EEA**”):

- In accordance with your instructions
- To comply with a legal obligation
- Work with any agents or advisers who we may use to offer support services

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

0800 458 0818  
info@optionis.co.uk

[Optionis.co.uk](https://www.optionis.co.uk)

Optionis HQ, 1110 Centre Park Square, Warrington, WA1 1RU

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal information.

#### **Access to your personal information**

You are entitled to make a data subject access request to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

#### **Request correction of personal information**

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

#### **Request erasure of your personal information**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see

below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

### **Object to processing of your personal data**

where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms

### **Request restriction of processing your personal data**

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it

### **Request transfer of your personal data**

We will provide to you, or a third party you have chosen, your personal data in a commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

### **Right to withdraw consent**

You have a right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent

Please note that you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.